Received by NSD/FARA Registration Unit 05/30/2018 6:02:47 PM

OMB No. 1124-0002; Expires May 31, 2020

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement

Pursuant to the Foreign Agents Registration Act of 1938, as amended

	For Six Month I	Period Ending 4/30	0/2018			
			(Insert date)			
	I	- REGISTRAN	r			
1. (a) Name of Registrant		(b) Registration	n No.			
Rosemont Associates, LLC		6161				
(c) Business Address(es) of Regist P.O. Box 216	trant		gen in the second of the secon			
Rosemont, NJ 08556	and the second					
	1					
2. Has there been a change in the info	rmation previously	furnished in connec	ction with the fo	illowing?		
(a) If an individual:		:17		and the second		
(1) Residence address(es)	Yes 🗀	No 🗌				
(2) Citizenship	Yes 🗆	No 🗆				
(3) Occupation	Yes 🗀	No 🗆		. ,	·	
(b) If an organization:				•		
(1) Name	Yes 🗔	No ⊠				
(2) Ownership or control	Yes 🗔	No ⊠	•		* .	
(3) Branch offices	Yes □	No ⊠	•			
(c) Explain fully all changes, if a).			
			٠.			
				• •		. **
		, to .				
	1	•				
		**				
			•			
<u> </u>	e de la companie de l					· · · ·
IF THE REGISTR.	ANT IS AN INDIV	IDUAL, OMIT R	ESPONSE TO	ITEMS 3, 4,	AND 5(a).	
3. If you have previously filed Exhibi	it C1, state whether a	inv changes therein	have occurred	during this 6 n	onth reporting n	eriod:
Yes □ No ⊠				च ण्याम्⊅ सर्वया र स	baran.8 b	
If yes, have you filed an amendmen	nt to the Exhibit C?	Yes 🗆	No □			• •
If no, please attach the required am				1		
it no, prease attach the required am	ienument.				* .	
	•					

FORM NSD-2 Revised 05/17

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

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(PAGE 2)

	Yes 🗆	. N	o 🔀		* *			•	4	
If yes, f	urnish the foll	wing info	rmation:							•
Name	1.2	Ü		·. ·	Position			Date Cor	nection End	ed
						,				
*+ \$0.				•						* *
			. **	•			•			
							• •			
(b) Have an	y persons beco	me partne	rs. officers, di	rectors or sin	nilar officials	during this	6 month rep	orting perio	ď?	•
• •	Yes □		lo 🖾	e .	•		. •			
If ves f	urnish the foll	owing info	rmation:							
Name	difficit die 1011	owing min	Residence	A ddress	Ci	tizenship		Position ·	Date A	ssumed
Manie	•		Residence a	1001035	Ci	n isi ripimb		ı oşındı	Daic A	Seumen
									-	
*										
1.										
(a) TTag and		:- T4 A7				64 - 1	400.00.00	. 8		
(a) mas any	person named			rvices direct	y in furtheran	ice of the in	terests of an	y toreign pr	incipal?	
T.C.	Yes 🗌	-	ю <u>П</u>				4.3			•
	dentify each s	ich person	and describe	the service re	ndered.					
N/A										
						•				
					e of the intere			•		
	al, or in a rela	ted or simil	ar capacity?	Yes 🗀	No	×			Data 4.	J '
secretari Name	al, or in a rela	ted or simil	ar capacity? Residence A	Yes 🗀	No			Position	Date As	ssumed
	al, or in a rela	ted or simil		Yes 🗀	No	×			Date As	ssumed
	al, or in a rela	ted or simil		Yes 🗀	No	×			Date As	ssumed
	al, or in a rela	ted or simil		Yes 🗀	No	×			Date As	ssumed
	al, or in a rela	ted or simil		Yes 🗀	No	×			Date As	sumed
	al, or in a rela	ted or simil		Yes 🗀	No	×			Date As	ssumed
Name			Residence A	Yes □	No Cit	⊠ izenship		Position		ssumed
Name (c) Have an	y employees o	or individue	Residence A	Yes □ Address filed a short	No Cit form registrati	izenship	nt, terminate	Position		ssumed
Name (c) Have an connect	y employees o	ır individuz gistrant du	Residence A	Yes □ Address filed a short	No Cit form registrati	⊠ izenship		Position		ssumed
Name (c) Have an connect If yes, fi	y employees o	ır individuz gistrant du	Residence A	Yes Address filed a short to the reporting	No Cit form registrati period? Y	izenship ion statemer	nt, terminate	Position I d their emp.	loyment or	
Name (c) Have an connect	y employees o	ır individuz gistrant du	Residence A	Yes Address filed a short to the reporting	No Cit form registrati	izenship ion statemer	nt, terminate	Position I d their emp.		
Name (c) Have an connect If yes, fi	y employees o	ır individuz gistrant du	Residence A	Yes Address filed a short to the reporting	No Cit form registrati period? Y	izenship ion statemer	nt, terminate	Position I d their emp.	loyment or	
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Name (c) Have an connect If yes, finame (d) Have an principa If yes, finame	y employees of ion with the returnish the following with the following this follo	or individus gistrant du owing infor owing infor month rep	Residence And the state of the	Yes Address filed a short to the short of	No Cit form registrati period? Y esition or Conf	izenship ion statement ion statement on statement	nt, terminate No ⊠	Position In their emp. Do not their conn	loyment or ate Terminat ection with a	ed any foreign
Name (c) Have an connect If yes, find Name (d) Have an principa If yes, find If y	y employees of ion with the returnish the following with the following this follo	or individus gistrant du owing infor owing infor month rep	Residence And the state of the	Yes Address filed a short to the short of	No Cit form registrati period? Y esition or Conf	izenship ion statement ion statement on statement	nt, terminate No ⊠	Position In their emp. Do not their conn	loyment or ate Terminat ection with a	ed any foreign
Name (c) Have an connect If yes, find Name (d) Have an principa If yes, find If y	y employees of ion with the returnish the following with the following this follo	or individus gistrant du owing infor owing infor month rep	Residence And the state of the	Yes Address filed a short to the short of	No Cit form registrati period? Y esition or Conf	izenship ion statement ion statement on statement	nt, terminate No ⊠	Position In their emp. Do not their conn	loyment or ate Terminat ection with a	ed any foreign
Name (c) Have an connect If yes, find Name (d) Have an principa If yes, find If y	y employees of ion with the returnish the following with the following this follo	or individus gistrant du owing infor owing infor month rep	Residence And the state of the	Yes Address filed a short to the short of	No Cit form registrati period? Y esition or Conf	izenship ion statement ion statement on statement	nt, terminate No ⊠	Position In their emp. Do not their conn	loyment or ate Terminat ection with a	ed any foreign
(c) Have an connect If yes, fi Name (d) Have an principa If yes, fi	y employees of ion with the returnish the following with the following this follo	or individua gistrant du owing infor r individua month rep owing infor	Residence And the state of the	Yes Address filed a short to the reporting Porting Po	No Cit form registrati period? Y esition or Com corm registrati No	izenship ion statement es nection on statement on statement	nt, terminate No ⊠ nt, terminate	Position ed their emp. Do d their conn	loyment or ate Terminat ection with a	ed any foreign

		PRIN	

	Has your connection with any foreign principal ended during the If yes, furnish the following information:	is 6 month reporting pe	riod? Yes □	No ⊠
	Foreign Principal		Date of Termination	
		<u> </u>		
	Have you acquired any new foreign principal(s) ² during this 6 r If yes, furnish th following information:	nonth reporting period?	Yes 🗔	No 🗵
	Name and Address of Foreign Principal(s)		Date Acquired	
:				
	In addition to those named in Items 7 and 8, if any, list foreign reporting period. National Council of Resistance of Iran	principal(s)² whom you	continued to represent d	uring the 6 mon
	National Council of Resistance of Itali			
10	(a) Have you filed exhibits for the newly acquired foreign prin Exhibit A ³ Yes No Exhibit B ⁴ Yes No	cipal(s), if any, listed in	Item 8?	
	If no, please attach the required exhibit.			
	(b) Have there been any changes in the Exhibits A and B previous represented during this six month period? If yes, have you filed an amendment to these exhibits?	Yes 🗌 N	ign principal whom you fo ⊠ fo □	
	If no, please attach the required amendment.	res i	, ·	

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III-	AC	TIV	TT	TES

11.	During this 6 month named in Items 7, 8,	reporting perior 9 of this sta	od, have you enternent?	ngaged in any Yes		or rendered any No □	services to any for	reign principal
	If yes, identify each	foreign princip	al and describ	e in full detail	your activiti	es and services:		
	Representing the Ira now located in Alba (See, Albach 1)							
	Je Himmer of						• •	
								· · · · · · · · · · · · · · · · · · ·
*	,		<u>.</u>					
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	•							
			•					
12.	During this 6 month	reporting peri	od, have you o	n behalf of an	y foreign prir	ncipal engaged i	n political activity ⁵	as defined below?
	Yes 🗵	No 🔲			.*			
	the relations, interest arranged, sponsored names of speakers ar	or delivered sp nd subject mat	peeches, lectur	ifluenced and es or radio and	the means en I TV broadca	nployed to achiests, give details	eve this purpose. If as to dates, places	the registrant of delivery,
	See Response to Qu	iestion 11						. •
						•		
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•	•	•		•			• • • • • • • • • • • • • • • • • • • •	•.
	•				* :			
13.	In addition to the abo foreign principal(s)?				ngaged in act	ivity on your ov	vn behalf which ber	iefits your
;	Term desails edle							
-	If yes, describe fully	•	•	ě			• • •	•
				• .				
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^{5 &}quot;Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

a)	statement, or from an	ES reporting period, have you ly other source, for or in the pensation or otherwise?				
	If no, explain why.		• · ·	-		
	ar and outpresses with					
	If yes, set forth belov	v in the required detail and	separately for ea	ch foreign principa	l an account of s	such monies.6
	Date	From Whom		Purpose	•	Amount
	See Attachment Two					
			•			
٠.						
			•.			
						\$110,000
			•			Total
(b)	During this 6 month foreign principal nam	PRAISING CAMPAIGN reporting period, have you ned in Items 7, 8, or 9 of the	is statement?	Yes 🗆	No ⊠	oney on behalf of any
•	If yes, have you filed	l an Exhibit D ⁸ to your regi	stration?	Yes 🗌	No □	
	If yes, indicate the da	ate the Exhibit D was filed.	Date	· · · · · · · · · · · · · · · · · · ·	-	
(c)		SOF VALUE reporting period, have you or 9 of this statement, or fi				
	Yes 🗆	No □				
	If yes, furnish the fol	llowing information:		•		
	Foreign Principal	Date R	eceived	Thing of Valu	e	Purpose
	NCRI	1/16/18 - 1/21/18	Rdtrip Airl	fare / Newark - Pa	ris;	Meetings
			Paris - Tira Tirana, All	ina; hotel in Paris : pania	and	
			mana, An	Jui 110.		
	NCRI	4/20/18 - 4/27/18		fare / Newark – Lo	· ·	Meetings
	7		London-II	rana; Tirana-Newa	air Kariu	

^{6,7} A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign

principal.

9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors; "kickbacks," and the like.

l5. (a)		nth reporting percent of the contract of the c	eriod, have you ies in connection v		on behalf o	of any fore	gn principal 1	named in Items 7, 8,	or
		ement? Yes		· •					
	(2) transmitted r	nonies to any s	uch foreign princip	pal?	Yes 🗌	No	X	• .	
	If no, explain in f	ull detail why	there were no disbu	irsements n	ade on beh	alf of any	oreign princi	pal.	
						2.1			
	If yes, set forth be monies transmitte	elow in the requed, if any, to ca	uired detail and ser ch foreign principa	parately for	each foreig	n principal	an account of	f such monies, includ	ling
	Date	1*	To Whom			Purpose		Amount	·
	11/1/17 thru	Robert To			Receipts fo	r Services	*	\$11,687	
	4/30/18	4			(See, A Ha	ch. 3)			
	11/1/17 thru	AT&T / Co	mcast		Cell / Office	امآ ۽		\$591	
•	4/30/18				·	C 1.C.I.		4331	
-									
		\$7 		•					•
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4.						•			
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		Yes 🗆	No 🗵				•
	If yes, furnish th	e following infor	mation:				
	Date	Recipient	•	Foreign Principal		Thing of Value	Purpose
 L.							
٠			· .				
٠.							
(c)	During this 6 mc other person, ma	de any contributi	iod, have y	you from your own ney or other things	of value11 in	connection with an e	her directly or through an election to any political s for political office?
	If yes, furnish th	e following infor	nation:				
	Date 1/11/18	Amount or \$1,000	Thing of		litical Organi e Pringle for	ization or Candidate	Location of Event
	2/1/18	\$2,000			Booker for		Florham Park, NJ

^{10, 11} Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V-INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, o	did you prepare, disseminate or cause to b	e disseminated any informational materials? 12
Yes □ No ⊠		
If Yes, go to Item 17. (b) If you answered No to Item 16(a), do y	ny diagaminata any matandal la anna astar	and the control of the control of
Yes □ No ⊠		
If Yes, please forward the materials dissen	ninated during the six month period to the	Registration Unit for review.
17. Identify each such foreign principal.		~ ~
•		
	4.	· .
18. During this 6 month reporting period, has a	any foreign principal established a hidget	or allocated a specified sum of money to
finance your activities in preparing or disse	,	Yes No
If yes, identify each such foreign principal	₹ ' · · ·	and the second of the second o
11 yes, admiry out the following printing	, opoorly unicount, and material for what pe	Alog of timo.
		Y STATE OF THE STA
 During this 6 month reporting period, did materials include the use of any of the following. 	your activities in preparing, disseminating owing:	or causing the dissemination of informational
	or newspaper	☐ Letters or telegrams
☐ Advertising campaigns ☐ Press relea	ses Pamphlets or other pu	blications Lectures or speeches
Other (specify)		
Electronic Communications		
☐ Email		
Website URL(s):		
☐ Social media websites URL(s):		
Other (specify)	The second secon	
00 7-1-41-641414141-	and the state of t	
20. During this 6 month reporting period, did y the following groups:	you disseminate or cause to be disseminat	ed informational materials among any or
☐ Public officials	☐ Newspapers	☐ Libraries
☐ Legislators	☐ Editors	☐ Educational institutions
☐ Government agencies	☐ Civic groups or associations	☐ Nationality groups
그 사람이 없는 사람들은 사람들이 되었다.	Civic groups of associations	□ Nationality groups
Other (specify)		
21. What language was used in the information	nal materials	
☐ English	Other (specify)	
22. Did you file with the Registration Unit, U. disseminated or caused to be disseminated		em of such informational materials Yes No
23. Did you label each item of such information Yes □ No □	onal materials with the statement required	by Section 4(b) of the Act?
		The second of th

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

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VI - EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)	(Print	t or type name under each sign	ature or provide electron	nic signature ^l
May 30, 2018		/s/ Robert G. Torricelli		eSigned
	_			
	•			

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

SHORT-FORM REGISTRATION INFORMATION SHEET

The Department records list active short-form registration statements for the following persons filed on the date indicated by each name. If a person is not currently functioning in the same capacity directly on behalf of the foreign principal, please indicate the date of termination in Item 5 of the supplemental statement.

Short Form List for Registrant: Rosemont Associates, LLC

Last Name	First Name	Registration Date
Torricelli	Robert G.	04/05/2013

Attachment One – Re: Question 11 & 12

Supplemental Statement / Registrant No. 6161 Period: November 1, 2017 – April 30, 2018

Date of Contact	Name/Title	<u>Manner</u>	Subject Matter
11/3	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
11/20	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
11/27	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
11/28	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
11/30	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
12/1	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
12/6	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
12/7	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
12/10	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
12/11	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
12/26	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
1/2	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
1/3	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania

Supplemental Statement / Registrant No. 6161
Period: November 1, 2017 – April 30, 2018
-- Page Two –

1/9	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
1/10	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
1/11	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
1/12	D. Muniz/DOS S. Epstein/DOS	Email	Resettlement of Iranian Refugees in Albania
1/16	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
1/16	D. Muniz/DOS	Meeting	Resettlement of Iranian Refugees in Albania
1/17	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
2/2	D. Muniz/DOS Timothy Enright/DOS	Email	Resettlement of Iranian Refugees in Albania
2/11	D. Muniz/DOS Timothy Enright/DOS	Email	Resettlement of Iranian Refugees in Albania
2/12	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
2/12	Martha Hood/DOS	Email	Resettlement of Iranian Refugees in Albania
2/12	D. Muniz/DOS	Call	Resettlement of Iranian Refugees in Albania
2/13	Martha Hood/DOS	Email	Resettlement of Iranian Refugees in Albania
2/14	D. Muniz/DOS	Call	Resettlement of Iranian Refugees in Albania

Supplemental Statement / Registrant No. 6161 Period: November 1, 2017 – April 30, 2018 -- Page Three –

2/18	D. Muniz/DOS Timothy Enright/DOS	Email	Resettlement of Iranian Refugees in Albania
2/21	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
2/22	D. Muniz/DOS	Call	Resettlement of Iranian Refugees in Albania
2/26	D. Muniz/DOS Timothy Enright/DOS Ivna Giauque/DOS	Email	Resettlement of Iranian Refugees in Albania
3/10	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
3/12	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
3/21	D. Muniz/DOS Timothy Enright/DOS Ivna Giauque/DOS	Email	Resettlement of Iranian Refugees in Albania
3/23	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
3/24	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
3/28	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
4/12	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
4/17	D. Muniz/DOS Martha Hood/DOS	Email	Resettlement of Iranian Refugees in Albania
4/18	D. Muniz/DOS	Call	Resettlement of Iranian Refugees in Albania

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4/19	D. Muniz/DOS	Call	Resettlement of Iranian Refugees in Albania
4/24	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
4/25	D. Muniz/DOS	Email	Resettlement of Iranian Refugees in Albania
4/25	D. Muniz/DOS	Meeting	Resettlement of Iranian Refugees in Albania

Attachment Two – Re: Question 14(a)
Supplemental Statement / Registrant No. 6161 Period: Nov. 1, 2017 - April 30, 2018

Payments to Registrant Rosemont Associates from National Council of Resistance of Iran for consulting fee:

<u>Date</u>	Amount
11/10/17	\$10,000
11/21/17	\$10,000
12/11/17	\$10,000
12/15/17	\$10,000
1/17/18	\$10,000
2/2/18	\$10,000
2/14/18	\$10,000
2/26/18	\$10,000
3/27/18	\$10,000
4/2/18	\$10,000
4/20/18	\$10,000
Total	\$110,000

Attachment Three – Re:Question 15(a) Supplemental Statement / Registrant No. 6161 Period: Nov. 1, 2017 – April 30, 2018

Disbursements from Rosemont to Robert Torricelli

<u>Date</u>	- ·	Amount
11/10/17		\$1,684
11/24/17		\$1,684
12/8/17		\$1,684
12/22/17		\$1,684
1/18/18	٠,	\$ 239
1/30/18	٠.	\$ 199
3/27/18		\$3,052
4/13/18		\$1,361
4/27/18		\$ 100
		\$11,687

Moneys received by Mr. Torricelli are determined by taking Rosemont's income during the period and determining what percentage of that income is derived from service to NCRI. That same percentage is then applied to his individual receipts during the period to yield a percentage representing that amount of receipts attributable to work for NCRI. Beginning in 2018, payments to Mr. Torricelli were changed from regular salary payments to unscheduled lump sum payments.